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August 28, 2001

Mr. Charles Findley
Acting Regional Administrator
U.S. Environmental Protection Agency, Region 10
1200 Sixth Avenue
Seattle, WA 98101

Subject: Modification of Table 2-4 of the Wastewater Treatment Unit Closure Plan,
Astaris Facility, Pocatello, Idaho
EPA ID No. IDD 070929518

Dear Mr. Findley:

FMC is submitting the enclosed modified Table 2-4 of the Wastewater Treatment Unit (WWTU) closure plan that shows the soil cleanup criteria for arsenic is 7.7 mg/kg, which is the site-specific background level for arsenic in surface soil. Consistent with Section 3.8 (Closure Plan Amendments) of the WWTU closure plan, Table 2-4 has been modified to correct an omission that came to light during the closure work as described below.

On August 1, 2001, FMC completed the subsurface sampling work in accordance with the WWTU closure plan, dated December 1999. The subsurface sampling was completed on August 1 and the final analytical reports were received on August 17. FMC has compared the soil sample analytical results with the cleanup levels described in Section 2.5 and specified on Table 2-4 of the WWTU closure plan, and became aware that relevant information was omitted from Table 2-4.

Table 2-4 of the WWTU closure plan identified the EPA-calculated risk-based concentration (RBC) for arsenic in soil as 1.43 mg/kg from the Feasibility Study Report for the FMC Subarea (Eastern Michaud Flats Site dated April 1997). However, the EPA-calculated Representative (background) Level for arsenic in soil is 7.7 mg/kg as shown on Table 4.2.1-2 of the Remedial Investigation Report for the Eastern Michaud Flats Site, dated August 1996. Thus, Table 2-4 has been modified to indicate that the soil cleanup criteria for arsenic in soil is the background level of 7.7 mg/kg. The results of the fourteen soil samples from the WWTU subsurface investigation ranged from 3.3 to 5.1 mg/kg which are all below the background level.

Based on this modification to the WWTU closure plan, the closure certification will be submitted by October 16 (within 60 days of receipt of the final analytical reports). Please feel free to contact me at (208) 236-8658 should you have questions regarding this information.

Very truly yours,



Rob J. Hartman
FMC Corporation

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Enclosure

cc: Andrew Boyd, EPA w/ enclosure
Linda Meyer, EPA w/ enclosure (2)
Susan Hanson, Shoshone Bannock Tribes w/ enclosure
Jeanette Wolfley, Shoshone Bannock Tribes w/ enclosure

TABLE 2-4
SOIL CLEANUP CRITERIA

FMC Facility Related Constituents and TCLP Metals	Eight TCLP Metals Toxicity Characteristic Level (mg/L)	EPA Risk Based Concentrations (RBCs)*
Arsenic	5.0	7.7 ⁽¹⁾
Barium	100	61,612
Beryllium	—	0.58
Cadmium	1.0	448
Chromium	5.0	896,457
Fluoride	—	53,787
Lead	5.0	NC
Mercury	0.2	269
Nickel	—	17,929
Selenium	1.0	4,482
Silver	5.0	4,482
Vanadium	—	6,275
Zinc	—	268,937

NC = not calculated or not available

* values are mg/kg

(1) This concentration is not an RBC since the EPA-calculated Representative (background) Level for arsenic in soil exceeds the RBC level. Consequently the EPA-calculated Representative (background) Level of 7.7 mg/kg, as shown on Table 4.2.1-2 of the Remedial Investigation Report for the Eastern Michaud Flats Site, dated August 1996, is used for soil cleanup criteria for arsenic.